

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALEXANDER FINANCE C.D., INC.	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	
ARKADY SIROTOVSKY, et.al.,	:	
Defendants and Third-Party	:	No. 02-CV-4977
Plaintiffs,	:	
	:	
v.	:	
	:	
PENN FINANCIAL GROUP, INC. et.al.	:	
Third-Party Defendants.	:	

**THIRD-PARTY DEFENDANT GENE BURD'S MOTION FOR LEAVE  
TO FILE A REPLY TO THIRD-PARTY PLAINTIFFS' OPPOSITION TO GENE  
BURD'S MOTION TO STRIKE IMPERMISSIBLE BILL OF PARTICULARS**

Grasping at straws, Third-Party Plaintiffs are desperately trying to save their baseless complaint against Third-Party Defendant Gene Burd. In their latest writing filed with the Court on September 17<sup>th</sup>, disguised as the response to Burd's motion to strike the improperly filed Bills of Particulars, Third-Party Plaintiffs are asking the Court to amend their Complaint. Not only was this request never raised by Third-Party Plaintiffs before and, as such, is not permissible by way of a response, but it is plainly contrary to the rules of this Court.

Accordingly, Burd respectfully requests this Court's leave to file a brief reply to the Third-Party Plaintiffs' response to address the above issues.

Respectfully submitted,

/s/ Gene Burd

Gene Burd, Esq.  
MARKS & SOKOLOV, LLC  
1835 Market Street, 28<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 569-8901  
On Behalf of Himself

Dated: September 20, 2004